

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ROBIN MCKEON,)	
)	
Plaintiff)	
)	
v.)	1:22-CV-10812-MJJ
)	
ROBERT REISER & CO., INC.,)	
)	
Defendant.)	

PLAINTIFF ROBIN MCKEON'S TRIAL BRIEF

Now comes Plaintiff, Robin McKeon, pursuant to Local Rule 16.5(f) and the May 14, 2025 Amended Order Setting Civil Jury Trial, to submit the following trial brief.

A. Succinct and Neutral Statement of Principle Claims and Defenses

Plaintiff is alleging that she was subjected to a hostile work environment amounting to sexual harassment, in violation of M.G.L. c. 151B, § 4, and that she suffered emotional distress as a result of this conduct. She claims that Defendants' actions created a sexually offensive work environment and a culture of disrespect toward female employees, which made her feel demeaned, disrespected and humiliated. Defendant denies that Plaintiff was subject to sexual harassment in the workplace.

B. Proposed Voir Dire Questions

1. Have you or a close family member ever been a witness, plaintiff, or defendant in a civil or criminal case?
2. Do you believe the court system treats everyone fairly?
3. Do you think people file too many lawsuits these days?
4. Do you know any of the parties, witnesses, or attorneys involved in this case?

5. Have you ever witnessed or been involved in a claim for sexual harassment in the workplace?
6. What are your views about the treatment of women in the workplace?
7. How do you feel about employees being exposed to off-color signs or images in the workplace?
8. How would you feel if your employer required you to wear a shirt with a sexually offensive message on it?
9. Have you ever worked for a food processing/packaging company?
10. Have you ever been a victim of sexual harassment?
11. Do you feel that a majority of sexual harassment in the workplace goes unreported?
12. Have you or any family member or close friend ever filed a lawsuit or grievance against your employer, supervisor, management, or another employee? If yes, please explain.
13. Do you work in an office setting?
14. Have you or any family member or close friend been employed in a human resources position or other position that involved administration or application of the antidiscrimination and harassment laws?
15. Have you ever held a supervisory position at work?
16. Have you ever owned a business? If yes, have you ever had a complaint filed against you by an employee of the business in relation to employment?
17. Do you believe that you or any of your close friends or family have been the victim of discrimination in the workplace because of your gender? If yes, please explain.
18. Have you ever been accused of sexual harassment?
19. Do you have any feelings about whether a company should prevent sexual harassment in the workplace?
20. Do you know of any reason whatsoever why you could not sit as a trial juror with absolute fairness and impartiality to all the parties in this case?

C. Motions in Limine and Foreseeable Evidentiary Disputes

1. Plaintiff filed a Motion in Limine to Preclude Evidence of Previously dismissed Claims (Doc. 90).
2. Plaintiff filed a Motion in Limine to Preclude Use and Introduction of Medical Records at Trial (Doc.91).
3. Defendant filed a Motion in Limine to Preclude Emotional Distress Damages (Doc. 87) and Plaintiff filed an Opposition (Doc. 89).
4. Plaintiff will be filing Oppositions to Defendant's four Motions in Limine, filed today, 10/2/2025. (Docs 92-95)

D. Requests for Jury Instructions

Please see Exhibit 1 setting out Plaintiff's proposed jury instructions.

E. Proposed Verdict Form

Please see Exhibit 2 with Plaintiff's proposed verdict form.

Respectfully submitted,

Robin McKeon,
By her attorneys,

/s/ Jean Zeiler

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Dated: October 2, 2025

CERTIFICATE OF SERVICE

I certify that a true copy of Plaintiff Robin McKeon's Trial Brief has been filed electronically on October 2, 2025, through the Court's CM/ECF system, and will be sent to counsel of record electronically as registered participants identified on the Notice of Electronic Filing.

/s/ Jean Zeiler
Jean Zeiler, Esq.